

15 MAR 2002

Mr. John Young
Director, Air and Land Protection Division
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102-0176

TES

Site:	Herculaneum
ID#	M000062166 373
Break:	1.0
Other:	3-15-02

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Dear Mr. Young:

This is in response to your February 8, 2002, letter concerning recontamination of properties in Herculaneum, Missouri. We have also reviewed the data provided by Doe Run on the yards that have been replaced over the last several years. Our conclusion is also that the historic rates at which some of these yards have become recontaminated is a serious concern.

The current SIP emission controls appear to be making considerable progress toward bringing the Herculaneum area into attainment with the ambient air quality standard for lead. In addition, steps to improve material handling should have also reduced the amount of lead in the ambient air. However, we agree that serious questions remain regarding the rate of recontamination following installation of the remaining SIP controls.

In order to demonstrate whether or not recontamination is an issue that requires further action, we agree with your proposal that our Agencies work together to develop and implement a deposition study plan. The purpose of this plan will be to determine the rate of recontamination of properties in and around Herculaneum. We would especially like to discuss some of the suggested activities mentioned in your letter.

We believe that this issue of recontamination may have a significant impact on the continued operation of the Doe Run facility. We do not believe that the residents of Herculaneum should be exposed to unacceptable risks posed by elevated lead concentrations through recontamination, nor should they be subject to repeated soil removals and dust cleaning programs to maintain the lead concentrations at safe levels.

I believe that it should be both our Agencies' intent to take all steps necessary to determine if recontamination remains a concern following installation of the remaining SIP controls, and pursue whatever additional actions are necessary to ensure that the recontamination rate is at acceptable levels. We look forward to working with you and your staff on this issue. If you have any questions, please contact me at 913-551-7401 - CORRECTED

Sincerely,
William A. Spratlin
Director, Air, RCRA, and Toxics Division

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